- Miscellaneous handwritten notes of BEW (WP)
- International Heritage, Inc. Scruggs et al. v. Howell & IHI (Correspondence)
 - 1-13-99 facsimile from BEW to DL, Esq. cc'd J. Mason Davis, Terri Gardner, and SVE (A/CP)
 - 1-5-99 correspondence from Mason Davis to BEW (A/CP)
 - 9-17-98 correspondence from Mason Davis to BEW w/ encl (A/CP)
 - 8-13-98 correspondence from Mason Davis to BEW (A/CP)
 - 7-27-98 facsimile from Mason Davis to BEW (A/CP)
 - 7-23-98 facsimile from Mason Davis to BEW 2 pages (A/CP)
 - 6-4-98 correspondence from Mason Davis to BEW w/ encl (A/CP)
 - 3-18-98 facsimile from BEW to Mason Davis 21 pages (A/CP)
 - 3-4-98 facsimile from BEW to CR (A/CP)
 - 3-4-98 facsimile from BEW to CR (A/CP)
 - 3-4-98 facsimile from BEW to Mason Davis (A/CP)
 - 3-4-98 facsimile from BEW to Mason Davis 20 pages (A/CP)
 - 2-18-98 facsimile from BEW to CR (A/CP)
 - 2-24-97 correspondence from CR to BEW (A/CP)
 - 2-18-98 facsimile from BEW to CR w/ encl (A/CP)
 - 2-18-98 facsimile from CR to BEW 2 pages (A/CP)
 - 2-17-98 facsimile from CR to BEW (A/CP)
 - 2-17-98 facsimile from CR to BEW 13 pages (A/CP)
 - 2-18-98 internal document of Wood & Francis (WP)
- Sales Tax of Nutritionals IHI General
 - 5-28-98 memo from Gene Davis to CR w/ exhibits (A/CP)
- International Heritage, Inc. General Sales Tax/Nutritional Supplements
 - 5-28-98 two drafts of memorandum from Gene Davis to CR (WP)
 - undated copy of written text regarding taxation (WP)
 - 5-27-98 handwritten notes of BEW (WP)
 - 5-27-98 draft memo from Gene Davis to CR with handwritten notes (WP)
 - undated copy of Alabama Statutes governing the Department of Revenue (WP)
 - 2-19-98 memo from Gene Davis to file (WP)
- Shareholder List 1998 IHI General
 - Note from GMM to BEW (WP)
 - 1997 draft shareholder list (WP)
 - miscellaneous Defendant names and addresses for Frederick Dobbins et al (WP)
 - 8-22-97 facsimile correspondence from AS to GMM 21 pages (A/CP)
 - 1997 draft of shareholder list with handwritten notes (WP)
 - 1997 copy of first page of shareholders list with yellow post-it bearing notes from GMM attached (WP)

FILED

TUE 10 2000

PEGGY B. DEANS, CLERK U.S. BANKRUPTCY COURT EASTERN DISTRICT OF N.C.

Political Action Committee

- 1-12-98 BEW handwritten notes attached to legislature list with numerous handwritten notes (WP)
- 3-4-98 facsimile transmission from Mike Deckert to CTF with handwritten notes from CTF to BEW (A/CP)
- 2-11-98; 2-10-98 handwritten notes of BEW (WP)
- 2-12-98 facsimile correspondence from SVE to BEW 2 pages (A/CP)
- 8-2-98 handwritten notes of BEW (WP)

Termination Letters – IHI General

- 11-17-97 facsimile correspondence from BEW to Jennifer Gruber, IHI employee 3 pages (A/CP)
- 11-12-97 facsimile correspondence from BEW to CR (A/CP)
- 11-12-97 facsimile correspondence from BEW to CR (A/CP)
- 11-7-97 facsimile correspondence from BEW to Pete Scanlon cc'd CR w/ encl (A/CP)
- 11-7-97 facsimile correspondence from IHI to BEW 1 page (A/CP)

• D&O Insurance Policy

- 12-17-98 facsimile correspondence from BEW to Joy and Terri Gardner, Esq. 19 pages (A/CP)
- Lobbying IHI
 - 2-27-98 facsimile from Robert Essay, Esq. to BEW 3 pages (A/CP)
- Jeff Hooks Loan Dispute
 - 1-23-98 copy of letter correspondence from Jeff Hooks to BEW w/ yellow post-it note from BEW to Elaine Tarkington attached (A/CP)
- Correspondence Swinney et al. v. IHI N.C.
 - 5-15-98 correspondence from GMM to BML cc'd SVE, BEW w/ encl (A/CP)
 - 7-1-98 correspondence from BEW to SVE, JB, Sabrina Wei, Jimmy Knowles, Barry Ackle, CS & LS (A/CP)
 - 6-25-98 facsimile from BEW to Mark Lane 6 pages (A/CP)
 - 6-25-98 ten page facsimile from MV to BEW (A/CP)
 - 6-23-98 facsimile correspondence from Dennis Lawson to BEW 1 page (A/CP)
 - 6-19-98 facsimile from BML to BEW 6 pages (A/CP)
 - 6-16-98 facsimile from BML to BEW 6 pages (A/CP)
 - 6-11-98 facsimile correspondence from BEW to BML, cc'd SVE, JB & CR (A/CP)
 - 6-1-98 facsimile correspondence from AS to Elaine Tarkington 19 pages (A/CP)
 - 5-27-98 facsimile from BML to BEW 3 pages (A/CP)
 - 5-22-98 facsimile correspondence from BML to BEW (A/CP)
 - 5-20-98 facsimile from John Austin to BEW 14 pages (A/CP)

- 5-20-98 memo from John Austin to BEW (A/CP)
- 5-19-98 facsimile correspondence from Theodore Sonde to BEW 3 pages (A/CP)
- 5-19-98 facsimile from MV to BEW 2 pages (A/CP)
- 5-18-98 facsimile from BEW to Sonde, Lawton 16 pages (A/CP)
- 5-18-98 facsimile correspondence from BEW to Sonde & Lawton (A/CP)
- 5-28-98 three page fax from Lawton to CR (A/CP)
- 4-28-98 two page fax from Sonde to BEW (A/CP)
- 4-15-98 sixteen page fax from AW to BEW (A/CP)
- 4-9-98 fourteen page fax from GMM to BEW (A/CP)
- 4-14-98 Wood & Francis internal document (WP)
- Attorney Notes Swinney et al. v. IHI NC
 - 6-23-98 deposition outline BEW notes (WP)
 - 6-24-98 BEW notes (WP)
 - 5-21-98 memo from Matthew Zeko to BEW (WP)
 - miscellaneous notes of BEW (WP)
 - undated draft memorandum in support of motion of IHI et al for transfer to Eastern District of North Carolina with handwritten notes of BEW (WP)
 - 6-12-98; 5-14-98; 5-13-98; 5-8-98 handwritten notes of BEW (WP)
 - 5-8-98 Elaine Tarkington copy of email transmission from AW to Elaine Tarkington (WP)
 - miscellaneous handwritten notes of BEW (WP)
- 8-K Information IHI General
 - 5-6-98 six page facsimile from GMM to RSH and RB (A/CP)
 - 4-6-98 eight page facsimile from GMM to RSH, BEW, LWB and SVE (A/CP)
 - 4-13-98 correspondence from GMM to RB, RSH, BEW, FDB cc'd SVE, JB, CR and Marks Lane (A/CP)
- Vines, Matt
 - 12-4-97 correspondence BEW to CR (A/CP)
 - 11-17-97 handwritten notes of BEW (WP)
 - miscellaneous notes of BEW (WP)
 - 11-6-97 ten page facsimile from BEW to CR (A/CP)
 - 11-6-97 facsimile correspondence from BEW to CR (A/CP)
 - 10-24-97 two page facsimile from CR to BEW (A/CP)
 - 10-29-97; 10-23-97; 10-16-97 notes of BEW (WP)
 - 10-9-97 facsimile from BEW to CR (A/CP)
 - 10-9-97 facsimile from BEW to William Vines cc'd CR (A/CP)
 - 10-9-97 facsimile from BEW to CR (A/CP)
 - 10-9-97 four page facsimile from BEW to CR (A/CP)
 - 9-24-97 correspondence from BEW to CR (A/CP)
 - 9-23-97 three page facsimile from CR to BEW (A/CP)
 - 9-23-97 handwritten notes from BEW (WP)
 - 9-18-97 facsimile from BEW to CR (A/CP)

- 9-18-97 handwritten notes from BEW (WP)
- Insurance Info Embezzlement Claim IHI General
 - 2-29-97 handwritten notes of BEW (WP)
- Cash-out Denial Info IHI General
 - 11-19-97 three page facsimile from BEW to CR (A/CP)
 - 11-19-97 facsimile from BEW to CR (A/CP)
 - 11-18-97 two page facsimile from CR to BEW (A/CP)
- Termination Letters IHI General
 - 11-6-97 handwritten notes of BEW (WP)
 - 10-16-97 correspondence from BEW to CR cc'd SVE, JB, Pete Scanlon, Jeff Hooks w/encl (A/CP)
 - 10-16-97 five page facsimile from CR to BEW cc'd Jennifer Gruver (IHI employee) (A/CP)
 - 10-24-97 seven page facsimile from Shannon Zeko to BEW (A/CP)
 - 10-24-97 one page facsimile from Shannon Zeko to BEW (A/CP)
- Common Law Marriage
 - 2-18-98 memo from Gene Davis to BEW (A/CP)(WP)
 - 9-5-95 Court opinion (WP)
 - 2-27-96 Court opinion (**WP**)
- Boswell, Rhonda IHI General
 - 10-24-97 IHI memo Shannon Zeko to BEW cc'd Pete Scanlon & CR (WP)(A/CP)
- Kara International IHI General
 - 3-9-98 correspondence from GMM to RB and Wolosky cc'd SVE, JB, RSH and BEW w/ attachment (A/CP)
- Better Business Bureau IHI General
 - 8-19-97 two page facsimile from CR to BEW (A/CP)
 - 8-26-97 transcription of voice mail message from Jerry Meyers to BEW (WP)
 - 9-24-97 handwritten notes of BEW (WP)
 - 9-23-97 five page facsimile from Jerry Meyers to BEW (A/CP)
 - 9-15-97 draft Better Business Bureau report on IHI, handwritten notes of BEW (WP)
 - 9-3-97 two page facsimile from Meyers to BEW (A/CP)
 - July 1997 Better Business Bureau report re: IHI (WP)
 - miscellaneous notes of BEW (A/CP)
 - 9-5-97 four page facsimile from BEW to Meyers (A/CP)

- 9-5-97 four page facsimile from BEW to Meyers (A/CP)
- 9-5-97 facsimile from BEW to CR cc'd SVE, JB and FDB w/ encl (A/CP)
- 9-5-97 facsimile from BEW to Meyers cc'd CR, JB, SVE & FDB w encl (A/CP)
- draft proposal for Better Business Bureau report (WP)
- 8-29-97 three page facsimile from BEW to CR (A/CP)
- 8-29-97 facsimile from BEW to Meyers cc'd CR, JB, SVE and FDB (A/CP)
- 9-2-97 handwritten notes of BEW (WP)
- 8-29-97 facsimile from BEW to Meyers cc'd CR, JB, SVE & FDB (A/CP)
- 3-10-97 three page facsimile from Elaine Tarkington to Meyeres (A/CP)
- 8-29-97 facsimile from BEW to Meyers cc'd CR, JB, SVE & FDB (A/CP)
- 8-29-97 facsimile from BEW to CR 1 page (A/CP)
- 8-25-97 two page facsimile from CR to BEW (A/CP)
- 8-21-97 three page facsimile from Pete Scanlon to BEW (A/CP)
- 8-20-97 eight page facsimile from CR to BEW (A/CP)
- 12-16-97 web courier news article re: David and Martha Crowe (WP)
- TeleQuest IHI General
 - 6-10-98 correspondence from BEW to JB w/ encl (A/CP)
 - 6-9-98 ten page facsimile from Ed Cary of IHI to BEW (A/CP)
- IHI Audit Letter Information
 - 4-2-98 correspondence from JB to BEW (A/CP)
 - 4-3-98 three page facsimile from JB to BEW (A/CP)
 - 1-15-98 correspondence from JB to BEW (A/CP)
 - Miscellaneous notes of BEW (WP)
 - 4-9-98 ten page facsimile from GMM to BEW (A/CP)
- WGST AM 750
 - Handwritten notes of BEW (WP)
- Compensation Slides
 - 11-9-97 draft compensation slides with handwritten notes of BEW (WP)
- D&O Insurance Policy
 - Miscellaneous handwritten notes of AEF (WP)
 - 6-18-98 eight page facsimile from BEW to GMM (A/CP)
 - 6-5-98 memo from Alan Woodlief to BEW (A/CP)
 - 4-16-98 correspondence from GMM to BEW (A/CP)
 - 4-1-99 correspondence from GMM to BEW cc'd JB and Richard Corbin w/ encl (A/CP)
- Wendell Property
 - 9-10-97 correspondence from BEW to SVE cc'd JB (A/CP)

- Miscellaneous handwritten notes (WP)
- Navy League
 - 5-6-98 Intrepid Museum Foundation confirmation (A/CP)
 - 5-18-98 two page facsimile from BEW to Michael Duncan (A/CP)
 - 10-6-97 six page facsimile from Linda Halsteadt, AS to AS but only two pages of the facsimile available (A/CP)
 - 10-16-97 correspondence from BEW to Robert Skirnick, Esq. (A/CP)
 - 10-16-97 correspondence from BEW to Commander R. C. Keller (A/CP)
 - 10-16-97 correspondence from BEW to Comadore Submarine Squadron 2, cc'd Commander RC Keller (A/CP)
 - 9-5-97 correspondence from BEW to SVE w/ encl (A/CP)
 - 8-29-97 facsimile correspondence one page (A/CP)
 - 9-5-97 correspondence from BEW to New York counsel Navy League, cc'd SVE and RSH (A/CP)
 - Miscellaneous handwritten notes of BEW (WP)
 - 9-5-97 correspondence from BEW to RSH (WP)
 - 8-29-97 two page facsimile from RSH to BEW (A/CP)
- October 24, 1998 Board Minutes IHI General
 - 10-24-98 draft Board of Directors meeting of IHI (WP)
 - 12-9-98 four page facsimile from BEW to AW (A/CP)
 - 11-9-98 miscellaneous handwritten notes of BEW (WP)
 - 11-25-98 eight page fax from AW to BEW (A/CP)
- Bernath v. Stanley H. Van Etten & IHI
 IHI General
 - 12-18-98 facsimile from BEW to SVE w/ encl (A/CP)
- Lobbying
 - 1-9-98; 3-6-98 handwritten notes of BEW (WP)
 - 3-6-98 five page facsimile Elaine Tarkington to BEW (A/CP)
 - 2-18-98 memo from Gene Davis to file w/ handwritten notes of BEW (A/CP)
 - 1-8-98; 8-3-98 handwritten notes of BEW (WP)
 - 2-9-98 correspondence from BEW to SVE cc'd JB, CR, Marks Lange, CTF and Gene Davis (A/CP)
 - 2-12-98 handwritten notes of BEW (WP)
 - 1-9-98 five page facsimile from SVE to BEW (A/CP)
 - 1-16-98 memo from Julie Bell to BEW (A/CP)
 - 1-14-98 three page facsimile from BEW to SVE (A/CP)
 - 1-8-97 correspondence from SVE to BEW (A/CP)
 - 1-14-98 handwritten notes of BEW (WP)
 - 1-14-98 facsimile from BEW to SVE (A/CP)
 - 2-12-97; 1-8-98; 1-6-98 handwritten notes of BEW (A/CP)
 - 11-12-97 three page facsimile from BEW to SVE (A/CP)

- 11-12-97 facsimile from BEW to SVE (A/CP)
- 9-27-97 message from JB to BEW (A/CP)
- 10-14-97 correspondence from BEW to JB w/ encl (A/CP)
- 10-8-97 correspondence from BEW to SVE cc'd CR, JB, CTF & Bernie Harrell, Esq. w/encl (A/CP)
- 9-23-97 three page facsimile from CR to BEW (A/CP)
- 9-29-97 transcript of message from Wilma Sherrill to BEW (A/CP)
- 9-24-97 correspondence from BEW to SVE (A/CP)
- miscellaneous handwritten notes of BEW (WP)
- 9-25-97 correspondence from BEW to CR cc'd SVE, JB, CTF and Bernard Harrell w/ encl (A/CP)
- 9-16-97 three page facsimile from BEW to SVE and JB (A/CP)

Win Capital Opinion Letter

- 11-3-97 notes from BEW (WP)
- 11-3-97 fourteen page facsimile from GMM to BEW (A/CP)
- 8-1-97 correspondence from GMM to Win Capital Corp. attn: Steven Bayern cc'd SVE, Steven Wolosky, RSH & Albert Barbera (A/CP)
- 7-14-97 copy of agency agreement between IHI and Win Capital Corp. (A/CP)
- 11-3-97 consulting agreement between IHI and Win Capital Corp.

Jeff Hooks Loan

- 6-1-99 correspondence from BEW to SVE w/ encl (A/CP)
- 5-21-99 four page facsimile from SVE to BEW (A/CP)
- 12-15-98 four page facsimile from BEW to SVE (A/CP)
- 12-21-98 correspondence from BEW to SVE (A/CP)
- 3-4-98 correspondence from BEW to SVE w/ encl (A/CP)
- 1-21-98 correspondence from BEW to Jeff Hooks cc'd SVE w/ encl (A/CP)
- 1-21-98 correspondence from BEW to SVE w/ encl (A/CP)
- 12-8-97 correspondence from BEW to Jeff Hooks cc'd SVE w/ encl (A/CP)
- 12-8-97 correspondence from BEW to SVE w/ encl (A/CP)
- 12-17-97 correspondence from BEW to SVE w/ encl (A/CP)
- 12-17-97 correspondence from BEW to Jeff Hooks cc'd SVE w/ encl (A/CP)
- 11-11-97 Elaine Tarkington copy of email transmission from BEW to Elaine Tarkington (A/CP)
- 11-10-97 five page facsimile from AW to BEW w/ handwritten notes (A/CP)
- 11-12-97 four page facsimile from AW to BEW (A/CP)
- 11-11-97 memo from SVE to BEW and Bob Gluhareff (A/CP)

- Dechart, Price & Rhoades Invoices
 - Invoices dated 7-10-98; 6-9-98; 6-23-98; 5-7-98; 9-28-98 (A/CP)
 - 11-28-98 facsimile from BML to BEW cc'd Rob Hukezalie (A/CP)
 - 12-17-98 facsimile from BML to BEW cc'd Rob Hukezalie (A/CP)

- 11-20-98 facsimile correspondence from BML to BEW cc'd Rob Hukezalie w/ encl (A/CP)
- 10-8-98 correspondence from BML to BEW (A/CP)
- 10-14-98 correspondence from BML to BEW cc'd Rob Hukezalie w/ encl (A/CP)
- 9-29-98 correspondence from BML to BEW cc'd Rob Hukezalie w/ encl (A/CP)
- 7-24-98 correspondence from BML to BEW cc'd Rob Hukezalie w/ encl (A/CP)
- 7-10-98 correspondence from BML to BEW cc'd Rob Hukezalie w/ encl (A/CP)
- 6-23-98 correspondence from BML to BEW cc'd Rob Hukezalie w/ encl (A/CP)
- 5-7-98 correspondence from Sonde to BEW cc'd Rob Hukezalie w/ encl (A/CP)

Gardere & Wynn Invoices

- Invoices dated 12-14-98; 1-28-99; 8-26-98; 9-16-98; 8-26-98; 7-9-98; 6-29-99; 6-29-98 (A/CP)
- 11-6-98 correspondence from Sue Halpern to BEW and SVE w/ encl (A/CP)
- 9-28-98 correspondence from BEW to Rob Hukezalie w/ encl cc'd JB & SVE (A/CP)
- 7-9-98 correspondence from Lange to BEW w/ encl (A/CP)

Kutak Rock Invoices

- Invoices dated 4-9-98 (A/CP)
- 4-27-98 note from AS to BEW (A/CP)

Sirote & Permutt Invoices

• Invoices dated 12-18-98; 2-1-98; 12-1-98; 9-23-98; 7-24-98; 7-24-98; 6-24-98; 5-25-98 (A/CP)

Wyrick Robbins Invoices

- 4-27-98 correspondence from Rob Hukezalie to FDB, cc'd BEW, SVE & JB (A/CP)
- 4-27-98 correspondence from Rob Hukezalie to Paul Greenburg, cc'd BEW, SVE & JB (A/CP)
- 4-27-98 correspondence from Rob Hukezalie to RB cc'd BEW, SVE & JB (A/CP)

• Brobeck, Phleger & Harrison Firm Brochure

- 3-30-98 correspondence from John Missing to GMM (A/CP)
- 4-15-98 correspondence from Sonde to BEW w/ encl (A/CP)

Wiring Information and Invoices

- 4-18-98 four page facsimile from Melissa to Elaine Tarkington with yellow post-it containing handwritten notes attached and taxi cab receipt attached (WP)(A/CP)
- 3-28-98 correspondence from Paul Greenburg to BEW w/ encl (A/CP)
- Kentucky Statute and Article from Babener

- 3-6-98 correspondence from JB to BEW cc'd SVE w/ encl (A/CP)
- Notes from Meeting with L. Whitaker, J. Pissaick, D. Crampton, SVE, JDB, CAR
 - 5-4-98 miscellaneous document with handwritten notes from BEW w/ a list of exhibits attached (WP)(A/CP)
 - 4-28-98 facsimile from BEW to Lloyd Whitaker, cc'd Gerald Juetter, JB, SVE, CR, Joel Piassick w/ encl (WP)
 - 4-24-98 facsimile correspondence from Lloyd Whitaker to JB, SVE, BEW, Joel Piassick and Gerald Juetter (WP)
- Van Etten Bankruptcy Info
 - 10-23-91 correspondence (A/CP)
 - 8-21-91 compromise brochure (WP)
- Research on GA Code Section OCGA 43-3-32
 - 7-2-98 eight page facsimile from Dave Gellan to AEF (A/CP)
- Invoices General IHI
 - 7-28-98 correspondence from Rob Hukezalie to BEW w/ encl (A/CP)
 - 7-16-98 correspondence from Rob Hukezalie to BEW (A/CP)
 - 3-4-99 correspondence from Wyche & Story to SVE (A/CP)
 - 3-16-99 correspondence from Howard Stallings to SVE (A/CP)
 - 3-16-99 correspondence from Howard Stallings to SVE (A/CP)
- Invoices from Wood & Francis IHI
 - Invoices dated 11-6-98; 7-6-98; 6-4-98; 5-4-98; 4-7-98; 3-5-98; 2-6-98; 1-6-98; 12-3-97; 7-6-98 (A/CP)

- Brisidine v. IHI Correspondence
 - 9-14-98 correspondence from BEW to CR cc'd JB w/ encl (A/CP)
 - 7-1-98 correspondence from BEW to CR w/ encl (A/CP)
- Correspondence Green et al. v. IHI Alabama
 - 1-13-99 facsimile from BEW to DL cc'd J. Mason Davis, Terri Gardner, SVE (A/CP)
 - 11-13-98 three page facsimile from Pamela Smith to BEW (A/CP)
 - 11-12-98 correspondence from Christopher Willis to BML cc'd BEW & DL (A/CP)
 - 11-12-98 two page facsimile from Pamela Smith to BEW (A/CP)
 - 10-30-98 two page facsimile from Pam Smith to BEW (A/CP)
 - 5-15-98 correspondence from GMM to BML cc'd SVE & BEW (A/CP)

- 10-9-998 two page facsimile from DL to BEW (A/CP)
- 10-2-98 facsimile from BEW to DL cc'd BML (A/CP)
- 10-2-98 two page facsimile from BEW to DL (A/CP)
- 9-14-98 facsimile from BEW to DL cc'd JB & GMM (A/CP)
- 8-31-98 facsimile from BEW to DL cc'd BML, JB & GMM (A/CP)
- 8-31-98 four page facsimile from BEW to DL (A/CP)
- 8-26-98 two page facsimile from DL to BEW (A/CP)
- 8-5-98 three page facsimile from Chris Willis to BEW (A/CP)
- 8-5-98 two page facsimile from Pam Williams to BEW (A/CP)
- 8-5-98 facsimile from DL to BEW (A/CP)
- 7-29-98 facsimile from BEW to DL cc'd BML, JB & GMM (A/CP)
- 7-29-98 two page facsimile from BEW to DL (A/CP)
- 7-9-98 correspondence from DL to BML (A/CP)
- 7-9-98 four page facsimile from DL to BML, MV and BEW (A/CP)
- 7-2-98 fifty-two page facsimile from Pam Williams to BEW (A/CP)
- 6-30-98 eight page facsimile from Pam Williams to BEW (A/CP)
- 6-26-98 four page facsimile from Williams to BEW (A/CP)
- 6-26-98 ten page facsimile from Williams to BEW (A/CP)
- 8-31-98 facsimile from BEW to GMM (A/CP)
- 8-31-98 seven page facsimile from BEW to GMM (A/CP)
- 8-24-98 correspondence from DL to BML cc'd BEW, Mason Davis, John Chiles, Chris Willis, Jim Martin (A/CP)
- 8-24-98 correspondence from DL to Richard Freese, Esq. (A/CP)
- 8-24-98 correspondence from GMM to BEW & MV (A/CP)
- 8-21-98 two page facsimile from Derrick Stryker to BEW (A/CP)
- 8-14-98 correspondence from GMM to BML (A/CP)
- 7-29-98 two page facsimile from BEW to BML (A/CP)
- 6-19-98 eleven page facsimile from BML to BEW (A/CP)
- 6-9-98 three page facsimile from BML to BEW (A/CP)
- 6-4-98 twenty-four page facsimile from BML to BEW (A/CP)
- 4-13-98 correspondence from GMM to LS and CS (A/CP)
- 4-6-98 facsimile cover sheet from CR to BEW (A/CP)
- 4-14-98 internal document for Wood & Francis (A/CP)

Van Etten – Vrsecky, Anthony

- 8-20-99 four page facsimile from RB to SVE & BEW (A/CP)
- 8-18-99 seven page facsimile from RB to SVE & BEW (A/CP)
- 7-30-99 correspondence from BEW to RB w/ encl cc'd SVE (A/CP)
- 7-28-99 Rhonda Peditto copy of email transmission from BEW to Rhonda Peditto w/ the following documents attached: 8-3-99 list of stored documents; 4-20-93 SVE answer in Kapp et al v. Wolf et al litigation; 3-1-93 complaint in Kapp v. Wolf litigation; undated document list from the Kapp litigation (A/CP)
- 6/2/99 eleven-page fax RB to BEW (A/CP)
- 1/4/99 three-page fax RB to SVE and BEW (A/CP)
- 3/18/99 four-page fax RB to SVE and BEW (A/CP)
- 9/14/99 Peditto copy of email transmission from RB to SVE, BEW cc'd Peditto (A/CP)
- 9/13/99 four page fax RB to BEW (A/CP)

- 9/15/99 BEW copy of correspondence from RB to Mark Abrahamson, Esq. NASD Resolution, Inc. re: Vresky and F.N. Wolf NASD Arbitration Case No. 95-02303 (A/CP)
- 9/13/99 BEW copy of correspondence from RB to James Davis, Esq. re: Vresky v. F.N. Wolf et al cc'd Lisa Golden, Michael Carey, Darrin Dowell and SVE with attachment (A/CP)
- 8/30/99 BEW copy of correspondence from RB to James Davis re: NASD Arbitration Case No. 95-02303 cc'd Lisa Golden, Michael Carey, Darrin Dowell and SVE (A/CP)
- 8/30/99 BEW copy of correspondence from RB to James Davis re: NASD Arbitration Case No. 95-02303 cc'd Lisa Golden, Michael Carey, Darrin Dowell and SVE with attachment (A/CP)
- Research Green, et al. v. IHI Alabama
 - Several Alabama Supreme Court decisions (WP)
- Attorney Notes Green, et al. v. IHI Alabama
 - 10/14/98 handwritten notes BEW (WP)
 - 10/22/98 handwritten notes BEW (WP)
 - 10/14/98 handwritten notes BEW (WP)
 - 6/29/98 handwritten notes BEW (WP)
 - 6/17/98 handwritten notes BEW (WP)
 - 6/10/98 handwritten notes BEW (WP)
- Brisidine v. IHI Pleadings
 - 6/25/98 S. Scott Seargent(?) to BEW with enclosures (A/CP)
- SEC v. IHI Attorney Notes
 - Empty
- Brisidine v. IHI Correspondence
 - 9/1/98 William M. Lawrence to BEW with enclosures (A/CP)
 - 8/10/98 S. Scott Seargent to BEW (A/CP)
 - 6/23/98 four-page fax BEW to S. Scott Seargent (A/CP)
 - 6/23/98 BEW to Seargent cc CR (A/CP)
 - 7/1/98 facsimile BEW to Seargent (A/CP)
 - 6/22/98 six-page fax BEW to Chris Willis (A/CP)
 - 7/1/98 three-page fax BEW to Seargent (A/CP)
 - 7/1/98 correspondence BEW to Seargent (A/CP)
- Craig T. Leibendorfer, et al. v. International Heritage, Inc., et al.
 - 1/21/99 three-page fax from Halpern to BEW (A/CP)
 - 12/31/98 six-page fax from Henry to BEW (A/CP)
 - 1/21/99 four-page fax from Halpern to BEW (A/CP)

- 12/31/98 six-page fax Henry to BEW (A/CP)
- 10/28/98 five-page fax Henry to BEW (A/CP)
- 10/22/98 pages 11 37 of 37-page fax from Gardere Wynn compromising Defendant's Objections to Plaintiff's First Set of Interrogatories and Request for Production (A/CP)
- Correspondence Lieberdorfer, et al. v. IHI Texas
 - 7/7/98 DL to Lawton and MV cc BEW (A/CP)
 - 1/28/99 BEW to SVE, LS and CS (A/CP)
 - 10/27/98 17-page fax from Halpern to SVE (A/CP)
 - 10/28/98 five-page fax from Rhonda Peditto to BEW (A/CP)
 - 10/26/97 36-page fax from Henry to BEW (A/CP)
 - 10/23/98 20-page fax Halpern to BEW (A/CP)
 - 10/27/98 three-page fax Halpern to BEW (A/CP)
 - 11/5/98 three-page fax Halpern to BEW (A/CP)
 - 11/5/98 three-page fax Halpern to BEW (A/CP)
 - 10/29/98 five-page fax Halpern to BEW (A/CP)
 - 10/22/98 facsimile correspondence from Halpern to BEW, Lawton and GMM (A/CP)
 - 5/15/98 GMM to Lawton with enclosure (A/CP)
 - 10/19/98 eight-page fax Halpern to BEW (A/CP)
 - 10/23/98 30-page fax Henry to BEW (A/CP)
 - 10/19/98 GMM to Halpern with enclosures (A/CP)
 - 10/19/98 three-page fax Halpern to BEW (A/CP)
 - 10/20/98 five-page fax Halpern to BEW (A/CP)
 - 10/16/98 six-page fax Halpern to BEW (A/CP)
 - 10/14/98 four-page fax Halpern to BEW (A/CP)
 - 10/13/98 four-page fax Halpern to BEW (A/CP)
 - 7/22/98 16-page fax Lawton to GMM (A/CP)
 - 9/22/98 15-page fax Henry to BEW (A/CP)
 7/2/98 13-page fax Henry to BEW (A/CP)
 - 7/1/98 fax Halpern to BEW (A/CP)
 - 5/21/98 14-page fax Sonde to BEW (A/CP)
 - 5/7/98 21-page fax Henry to BEW (A/CP)
 - 5/5/98 eight-page fax Halpern to BEW (A/CP)
 - 5/12/98 eight-page fax MV to Halpern and Henry (A/CP)
 - 4/29/98 correspondence Lang to BEW with enclosure (A/CP)
 - 5/18/98 two-page fax MV to DH (A/CP)
 - 5/18/98 two-page fax MV to Henry (A/CP)
 - 5/9/98 three-page fax Kim Barry to BEW (A/CP)
 - 5/9/98 three-page fax Kim Barry, IHI employee to BEW (A/CP)
 - 5/6/98 BEW to Lawton (A/CP)
 - 4/27/98 14-page fax Sond to BEW (A/CP)
 - 4/20/98 three-page fax Lang to BEW (A/CP)
 - 5/7/98 correspondence Henry to BEW and Sond (A/CP)
 - 5/15/98 three-page fax MV to BEW (A/CP)
 - 4/23/98 three-page fax Lang to BEW (A/CP)
 - 4/14/98 Wood & Francis internal document (WP)
 - 4/7/98 GMM to BEW (A/CP)

- Miscellaneous Documents
 - 7/29/98 58-page fax Lang to BEW (A/CP)
- Attorney Notes Liebendorfer, et al. IHI Texas
 - 7/13/98 handwritten notes BEW (WP)
 - 5/8/98 handwritten notes BEW (WP)
 - 4/17/98 handwritten notes BEW (WP)
 - 4/13/98 handwritten notes BEW (WP)
 - 4/17/98 handwritten notes BEW (WP)
- Discovery Liebendorfer, et al. v. IHI Texas
 - 10/26/98 correspondence Halpern to Keith M. Jensen, Esq. with enclosures (A/CP)
 - 10/27/98 Henry to BEW with enclosure (A/CP)

- Josephson Attorney-Client Privilege
 - 9/22/98 IHI memo from GMM to AEF labeled Confidential Attorney Work Product regarding Jenna E. Josephson v. International Heritage, Inc. Litigation. Attached to this memo is a large body of documents from GMM (WP)(A/CP)
- NC Sales Tax Temp File
 - 12/16/98 two-page fax Charles H. Mercer to BEW (A/CP)
 - 12/3/98 three-page fax Mercer to BEW (A/CP)
 - 12/8/98 three-page fax Mercer to BEW (A/CP)
 - 12/14/98 two-page fax Mercer to BEW (A/CP)
 - 10/2/98 fax BEW to Mercer (A/CP)
 - 10/2/98 nine-page fax BEW to GMM (A/CP)
 - 10/1/98 correspondence Mercer to BEW (A/CP)
 - 9/29/98 BEW to Mercer (A/CP)
 - 9/14/98 two-page fax BEW to GMM (A/CP)
 - 10/9/98 postmarked envelope containing 10/9/98 GMM to Mercer with enclosures cc Joe McLeod, Rob Hukezalie and BEW all three without enclosures (A/CP)
- Gilbert v. IHI Correspondence
 - 6/1/99 BEW to SVE (A/CP)
 - 3/23/99 Peditto to Anna and Chante Mayflower Capital (A/CP)
 - 3/18/99 Peditto copy of email transmission from Peditto to BEW (A/CP)
 - 2/8/99 BEW to SVE (A/CP)
 - 12/8/99 Peditto copy email transmission Peditto to BEW (A/CP)
 - 11/2/98 three-page fax Lawton to BEW (A/CP)

- 11/3/98 two-page fax Sond to BEW (A/CP)
- 9/29/98 19-page fax BEW to Lawton (A/CP)
- 9/18/98 13-page fax Lawton to BEW (A/CP)
- 9/17/98 14-page fax Lawton to BEW (A/CP)
- 9/10/98 eight-page fax Lawton to BEW (A/CP)
- 9/10/98 eight-page fax Lawton to BEW (A/CP)
- 8/4/98 six-page fax GMM to BEW and MV (A/CP)
- 9/28/98 seven-page fax Pamela Williams to BEW (A/CP)
- 9/28/98 eight-page fax Williams to BEW (A/CP)
- 9/25/98 eight-page fax Williams to BEW (A/CP)
- 9/25/98 two-page fax Williams to BEW (A/CP)
- 9/22/98 two-page fax Williams to BEW (A/CP)
- 9/22/98 four-page fax Williams to BEW (A/CP)
- 9/18/98 13-page fax Williams to BEW (A/CP)
- 8/5/98 four-page fax Chris Willis to BEW (A/CP)
- 7/22/98 16-page fax DL to BEW and Lawton (A/CP)
- 7/7/98 GMM to BEW (A/CP)
- 9/29/98 fax BEW to DL (A/CP)
- 9/29/98 " (A/CP)
- 9/29/98 19-page fax BEW to DL (A/CP)
- 10/1/98 eight-page fax Williams to BEW (A/CP)
- 10/28/98 30-page fax Williams to BEW (A/CP)
- 9/29/98 seven-page fax Williams to BEW (A/CP)
- 10/1/98 11-page fax Williams to BEW (A/CP)
- 10/2/98 three-page fax Chris Willis to BEW (A/CP)
- 10/2/98 three-page fax Chris Willis to BEW (A/CP)
- 10/28/98 five-page fax Pamela Smith to BEW (A/CP)
- NC Sales Tax Temp File (Second Heading)
 - 11/24/98 BEW to Mercer with enclosure (A/CP)
- Attorney Notes
 - 3/4/99 Memo from AEF to BEW with attachment (A/CP)
 - 12/10/98 Peditto copy of email transmission from Peditto to BEW with yellow Post-It Note attached (A/CP)
 - Miscellaneous Notes BEW (WP)
- International Heritage, Inc. Donald Butler Attorney Notes
 - 9/28/98 handwritten notes BEW (WP)
- International Heritage, Inc. Donald Butler Correspondence
- 10/8/98 GMM to BEW with attachment (A/CP)
- 9/29/98 seven-page fax BEW to GMM (A/CP)
- 9/29/98 seven-page fax BEW to CR (A/CP)

- 9/28/98 facsimile correspondence BEW to GMM (A/CP)
- 9/10/98 GMM to BEW (A/CP)
- 9/9/98 two-page fax Halstead to BEW (A/CP)
- 9/3/98 correspondence GMM to MV with attachment (A/CP)
- 9/9/98 note from MV to BEW attached (A/CP)
- 9/8/98 three-page fax BEW to Lawton (A/CP)
- 9/4/98 eight-page fax GMM to MV (A/CP)
- 8/24/98 Lawton to GMM (A/CP)
- Miscellaneous Documents
 - 8/20/98 seven-page fax CR to BEW (A/CP)
 - 9/2/98 17-page fax BEW to GMM (A/CP)
- International Heritage, Inc. Joanna Bise Attorney Notes
 - 9/29/98 Memo AEF to BEW (WP)(A/CP)
- International Heritage, Inc. Joanna Bise Correspondence
 - 9/22/98 GMM to BEW (A/CP)
 - 9/15/98 DL to BEW (A/CP)
 - 9/29/98 BEW to DL with enclosure (A/CP)
 - 9/29/98 seven-page fax BEW to DL (A/CP)
 - 9/22/98 three-page fax GMM to BEW (A/CP)
- International Heritage, Inc. Joanna Bise Client Documents
 - Undated two-page rep list marked Attorney-Client Privileged (WP)(A/CP)
- Gilliam, John (Virginia Matter) IHI
 - 7/28 handwritten notes on inside of folder from AEF (WP)
 - Copies of North Carolina General Statutes (WP)
 - 8/31/98 two-page fax Tim Otto to AEF (A/CP)
 - 9/1/98 five-page fax AW to BEW (A/CP)
 - Undated draft of Objection to Default with handwritten notes BEW (WP)
 - 8/20/98 seven-page fax Viola Speller to Elaine Tarkington (A/CP)
 - 8/17/98 four-page fax Tim Otto to AEF (A/CP)
 - 9/24/98 four-page fax GMM to AEF (A/CP)
- Thorn, Paul and Andrea
 - 11/18/98 fax from Peditto to Peter Scanlon (A/CP)
 - Undated Interoffice Memorandum from SVE to GMM and CR, CC, JB, Jeff Hooks, Ken Rudd, Gary Racer, BEW (A/CP)
 - Undated Interoffice Memorandum from SVE to GMM and CR, CC, JB, Jeff Hooks, Ken Rudd, Gary Racer, BEW (A/CP)

- Undated Interoffice Memo from CR and Peter Scanlon to SVE, CC, GMM, JB, Ken Rudd, Gary Racer, BEW (A/CP)
- Undated Interoffice Memo from CR and Peter Scanlon to SVE, CC, GMM, JB, Ken Rudd, Gary Racer, BEW (A/CP)
- Gina Josephson Correspondence
 - 4/18/98 correspondence GMM to AS with enclosures (A/CP)
 - 5/28/97 three-page fax GMM to JB with handwritten notes of GMM attached (A/CP)
 - 9/8/98 five-page fax AEF to GMM (A/CP)
 - 9/8/98 facsimile communication AEF to GMM (A/CP)
 - 2/13/96 GMM to DA (A/CP)
 - 3/21/96 FDB to SVE (A/CP)
 - 3/22/96 12-page fax GMM to SVE (A/CP)
 - Undated Handwritten Notes AEF (WP)
 - Various copies of North Carolina Court Opinions (WP)

- Miscellaneous Documents
 - 12/31/98 six-page fax Henry to BEW (A/CP)
- Client Documents Marsh, et al. v. IHI Texas
 - Undated Plaintiff Information Sheet Denise Marsh with upline and application attached (WP)
 - 5/7/98 four-page fax DH to BEW (A/CP)
 - 5/8/98 five-page fax DH to BEW (A/CP)
 - 5/7/98 four-page fax DH to BEW (A/CP)
 - 5/8/98 five-page fax DH to BEW (A/CP)
 - 5/10/98 nine-page fax Angie Chiavone to BEW (A/CP)
- Research Marsh, et al. v. IHI Texas
 - Northern District Texas Court Opinion (WP)
- Attorney Notes Marsh, et al. v. IHI Texas
 - 1/14/99 handwritten notes BEW (WP)
 - 1/13/99 transcript of voice mail from Russ E. Tucker to BEW with handwritten notes BEW (WP)
 - 7/27/98 correspondence GMM to BEW with attachment (A/CP)
 - 7/27/98 handwritten notes BEW (WP)
 - 7/16/98 handwritten notes BEW (WP)
 - 7/16/98 handwritten notes BEW (WP)
 - 7/20/98 handwritten notes BEW (WP)
 - 7/20/98 handwritten notes BEW (WP)

- 7/21/98 handwritten notes BEW (WP)
- 7/14/98 handwritten notes BEW (WP)
- 7/29/98 handwritten notes BEW (WP)
- 6/18/98 handwritten notes BEW (A/CP)
- 6/19/98 seven-page fax from Detrid, Price & Rhodes with handwritten notes (A/CP)
- Undated draft Defendant's Answer to Plaintiff's First Amended Petition in Marsh, et al. v. IHI, et al. (WP)

Marsh

- Undated draft Defendant's Memorandum in Opposition with handwritten attorney notes (WP)
- 7/24/98 32-page facsimile Henry to BEW (A/CP)
- 8/11/98 two-page fax BEW to Lawton (A/CP)
- 8/11/98 correspondence BEW to Lawton and Halpern (A/CP)
- 8/11/98 two-page fax BEW to Halpern (A/CP)
- 8/7/98 correspondence BEW to Catherine Botticelli, Esq. (A/CP)
- 8/6/98 correspondence BEW to Rob Hukezalie (A/CP)
- 8/6/98 facsimile BEW to Halpern (A/CP)
- 7/29/98 two-page fax BEW to MV (A/CP)
- 7/29/98 two-page fax BEW to Halpern (A/CP)
- 7/27/98 correspondence GMM to BEW with handwritten notes Attorney-Client Privileged with enclosures (A/CP)
- 7/27/98 five-page fax MV to BEW (A/CP)
- 7/22/98 15-page fax Halpern to BEW (A/CP)
- 7/17/98 correspondence GMM to MV and BEW (A/CP)

Miscellaneous Documents

- 8/19/98 22-page fax Botticelli to BEW (A/CP)
- 8/31/98 10-page fax Halpern to BEW (A/CP)
- 8/13/98 12-page fax Halpern to BEW (A/CP)
- 9/10/98 5-page fax Henry to BEW (A/CP)
- 8/10/98 correspondence to Halpern and Boticelli and BEW with enclosures (A/CP)
- Correspondence Marsh, et al. v. IHI Texas
 - 6/22/98 eight-page fax Henry to BEW (A/CP)
 - 6/15/98 fax Halpern to BEW (A/CP)
 - 5/11/98 21-page fax GMM to BEW (A/CP)
 - 5/20/98 correspondence BEW to Henry with enclosures (A/CP)
 - 5/20/98 BEW to Henry with enclosures (A/CP)
 - 5/14/98 three-page fax Henry to BEW (A/CP)
 - 5/14/98 two-page fax Henry to BEW (A/CP)
 - 5/11/98 GMM to BEW with enclosures (A/CP)
 - 5/10/98 nine-page fax Angie Chiavone to BEW (A/CP)
 - 5/1/98 facsimile BEW to GMM (A/CP)
 - 8/24/98 four-page fax Henry to BEW (A/CP)

- 4/24/98 three-page fax Henry to BEW (A/CP)
- 4/15/98 113-page fax BEW to Kevin Muck, Esq. (A/CP)
- 4/14/98 Internal Wood & Francis document (WP)
- Correspondence Marsh, et al. v. IHI Texas II
 - 7/20/98 four-page fax Halpern to BEW (A/CP)
 - 7/20/98 nine-page fax Halpern to BEW (A/CP)
 - 7/17/98 correspondence MV to BEW with enclosures (A/CP)
 - 7/16/98 two-page fax Botticelli to BEW (A/CP)
 - 7/9/98 three-page fax Lang to BEW (A/CP)
 - 7/8/98 13-page fax Halpern to BEW (A/CP)
 - 7/8/98 12-page fax Halpern to BEW (A/CP)
 - 7/7/98 17-page fax Lawton to BEW (A/CP)
 - 7/7/98 three-page fax Halpern to BEW (A/CP)
 - 7/2/98 11-page fax Henry to BEW only three pages of this fax are here (A/CP)
 - 6/30/98 correspondence Halpern to Lawton, Botticelli and BEW (A/CP)
 - 6/15/98 five-page fax Halpern to BEW (A/CP)
 - 6/16/98 20-page fax Henry to BEW (A/CP)
 - 7/2/98 fax BEW to GMM cc MV, Brothers and Halpern (A/CP)
 - 7/2/98 20-page fax BEW to Halpern (A/CP)
 - 7/1/98 20-page fax BEW to GMM (A/CP)
 - 6/29/98 11-page fax Halpern to BEW (A/CP)
 - 6/25/98 22-page fax Halpern to BEW only three pages of this are present (A/CP)
 - 6/23/98 three-page fax Halpern to BEW (A/CP)
 - 6/23/98 six-page fax Henry to BEW (A/CP)
 - 6/22/98 15-page fax Halpern to BEW (A/CP)
- Correspondence Marsh, et al. v. IHI Texas
 - 7/24/98 40-page fax Halpern to BEW (A/CP)
 - 7/24/98 41-page fax Halpern to BEW c/o RB with handwritten notes BEW (A/CP)
 - 7/24/98 41-page fax Halpern to BEW c/o RB (A/CP)
 - 7/23/98 fax BEW to Halpner cc MV, Brothers, Reid and Lawton (A/CP)
 - 7/23/98 six-page fax Henry to BEW (A/CP)
 - 7/23/98 10-page fax Halpern to BEW only three pages exist (A/CP)
 - 7/22/98 17-page fax Halpern to BEW handwritten notes BEW (A/CP)
 - 7/22/98 13-page fax Halpern to BEW handwritten notes BEW (A/CP)
 - 7/22/98 five-page fax BEW to Halpern (A/CP)
 - 7/22/98 correspondence GMM to Halpern (A/CP)
 - 7/21/98 six-page fax BEW to Halpern (A/CP)
 - 7/21/98 fax BEW to Halpern (A/CP)
 - 7/21/98 five-page fax BEW to MV (A/CP)
 - 6/12/97 GMM to DH (A/CP)

Denise Marsh Deposition Transcript

- 7/21/98 correspondence Halpern to Lawton with enclosure (A/CP)
- Miscellaneous Document
 - 8/28/98 deposition summary AEF to BEW (WP)
- Deposition Outlines
 - Undated deposition outline Tucker (WP)
 - 7/14/98 Deposition outline Marsh (WP)
- Correspondence IV
 - 8/28/98 nine-page fax Halpern to BEW (A/CP)
 - 8/28/98 nine-page fax Henry to BEW (A/CP)
 - 8/26/98 five-page fax Halpern to BEW (A/CP)
 - 8/21/98 45-page fax Halpern to BEW (A/CP)
 - 8/21/98 five-page fax Halpern to BEW (A/CP)
 - 8/21/98 50-page fax Halpern to BEW (A/CP)
 - 8/20/98 BEW to CR and JB (A/CP)
 - 8/13/98 three-page fax Halpern to BEW (A/CP)
 - 8/12/98 11-page fax Botticelli to BEW (A/CP)
 - 8/11/98 seven-page fax Botticelli to BEW (A/CP)
 - 8/11/98 two-page fax Halpern to BEW (A/CP)
 - 7/22/98 four-page fax Halpern to BEW (A/CP)
 - 8/6/98 13-page fax BEW to Halpern (A/CP)
 - 8/6/98 13-page fax BEW to MV (A/CP)
 - 7/29/98 four-page fax Henry to BEW (A/CP)
 - 7/28/98 BEW to GMM with enclosure (A/CP)
 - 7/27/98 IHI memo Kevin Jones to GMM cc Robin Land Marked Attorney-Client Privileged (A/CP)
 - 7/27/98 five-page fax Henry to BEW (A/CP)
 - 7/27/98 Henry to Lawton, MV and BEW (A/CP)
 - 7/24/98 44-page fax MV to BEW (A/CP)

Correspondence V

- 9/29/98 facsimile correspondence BEW to Halpern (A/CP)
- 9/29/98 three-page fax BEW to Halpern (A/CP)
- 9/29/98 BEW to Lawton (A/CP)
- 9/28/98 five-page fax Halpern to BEW (A/CP)
- 9/28/98 five-page fax Halpern to BEW (A/CP)
- 9/23/98 seven-page fax Henry to BEW (A/CP)
- 9/23/98 three-page fax Henry to BEW (A/CP)
- 9/22/98 13-page fax Henry to BEW (A/CP)
 9/21/98 19-page fax Henry to BEW (A/CP)
- 9/18/98 Halpern to Lawton and BEW with enclosure (A/CP)

- 9/16/98 27-page fax Halpern to BEW (A/CP)
- 9/16/98 two pages of a 27-page fax Halpern to BEW (A/CP)
- 9/16/98 34-page fax Halpern to BEW (A/CP)
- 9/15/98 31-page fax Halpern to BEW (A/CP)
- 8/28/98 four-page fax Henry to BEW (A/CP)
- 9/29/98 three-page fax BEW to DL (A/CP)
- 9/16/98 correspondence BEW to GMM cc JB and SVE (A/CP)
- 8/11/98 five-page fax Lawton to BEW (A/CP)

Correspondence VI

- 6/1/99 Halpern to BEW (A/CP)
- 1/15/99 BEW to SVE, CS and LS with enclosure (A/CP)
- 1/15/99 facsimile BEW to Halpern (A/CP)
- 1/14/99 correspondence BEW to SVE (A/CP)
- 1/14/99 correspondence BEW to Halpern with enclosures cc SVE (A/CP)
- 1/13/99 four-page fax Halpern to BEW (A/CP)
- 12/31/98 six-page fax Henry to BEW (A/CP)
- 10/29/98 two-page fax Halpern to BEW (A/CP)
- 11/2/98 three-page fax Halpern to BEW (A/CP)
- 5/15/98 GMM to Lawton with enclosure (A/CP)
- 10/22/98 six-page fax BEW to Halpern (A/CP)
- 10/22/98 six-page fax BEW to Lawton (A/CP)
- 10/22/98 seven-page fax Halpern to BEW (A/CP)
- 10/19/98 29-page fax Henry to BEW (A/CP)
- 10/19/98 19-page fax Lawton to Halpern cc BEW (A/CP)
- 10/18/98 four-page fax Halpern to BEW (A/CP)
- 10/16/98 two-page fax Lawton to BEW (A/CP)
- 10/15/98 eight-page fax Halpern to BEW (A/CP)
- 10/7/98 correspondence James Russell Tucker to 101st Judicial District Court cc Halpern, BEW and Bernie Hauder (A/CP)
- 10/2/98 Halpern to BEW (A/CP)
- 10/2/98 three-page fax Halpern to BEW (A/CP)

Box 96W342I 115

- GMM Draft Responses to Discovery
 - 7/17/98 correspondence GMM to MV and BEW entitled Attorney Work Product with enclosures (WP)(A/CP)
- Research Meckenstock, et al. v. IHI NC Fed.
 - One U.C. Code Service reference (WP)
 - One court decision Eastern District of Virginia (WP)
 - One reference to the Federal Rules of Appellate Procedure (WP)
 - Various other references to U.S. Statutes and Rules of Procedure (WP)

- Copy of Plaintiffs' Memorandum of Law in Opposition to Defendant's Objection to Magistrate's Memorandum and Recommendation (WP)
- One U.S. Code reference with handwritten notes (WP)
- One U.S. Rules reference with handwritten notes (WP)

Attorney Notes

- 6/14/99 handwritten notes BEW (WP)
- 6/9/99 handwritten notes BEW (WP)
- 5/20/99 Peditto copy of email transmission from Peditto to BEW (A/CP)
- 5/25/99 Peditto copy of email transmission from BEW to Peditto (A/CP)
- 5/28/99 handwritten notes BEW (WP)
- Miscellaneous notes BEW (WP)
- Undated draft Defendant's Report of Parties' Planning Meeting with edits and handwritten notations (WP)
- 12/21/98 Gene Davis copy of email transmission from BEW to Gene Davis cc Rhonda Peditto (A/CP)
- 1/27/99 transcript of voice mail message from BEW to Gene Davis with handwritten notes (A/CP)
- 1/27/99 handwritten notes Gene Davis (WP)
- 2/1/99 handwritten notes Gene Davis (WP)
- Miscellaneous notes Gene Davis (WP)
- 2/17/98 handwritten note BEW attached to draft Defendant's Reply to Plaintiffs' Memorandum of Law (WP)
- Miscellaneous handwritten notes (WP)
- 7/21/98 handwritten notes BEW (WP)
- 6/22/98 handwritten notes BEW (WP)
- 6/1/98 handwritten notes BEW (WP)
- 6/2/98 handwritten notes BEW (WP)
- Correspondence I Meckenstock, et al. v. IHI NC Fed
 - 8/14/98 Lawton to BEW (W/CP)
 - 6/10/98 GMM to Lawton (A/CP)
 - 6/3/98 nine-page fax Lawton to BEW (A/CP)
 - 6/3/98 10-page fax BEW to Lawton (A/CP)
 - 6/3/98 GMM to Lawton cc CR and BEW (A/CP)
 - 6/2/98 18-page fax Henry to BEW (A/CP)
 - 6/2/98 two-page fax Lawton to BEW (A/CP)
 - 6/2/98 six-page fax Lawton to BEW (A/CP)
 - 6/2/98 six-page fax Lawton to BEW (A/CP)
 - 6/2/98 two-page fax Lawton to BEW (A/CP)
 - 6/1/98 seven-page fax BEW to Lawton (A/CP)
 - 6/1/98 six-page fax Lawton to BEW (A/CP)
 - 5/28/98 six-page fax BEW to Lawton and MV (A/CP)
 - 5/28/98 correspondence BEW to Lawton and MV with enclosures (A/CP)
 - 5/18/98 BEW to Lawton (A/CP)
 - 5/11/98 BEW to Botticelli (A/CP)

- 4/27/98 13-page fax BEW to Sond (A/CP)
- 4/24/98 10-page fax Dennis J. Lawson to BEW (A/CP)
- 4/14/98 Wood & Francis internal document (WP)
- Correspondence II Meckenstock, et al. v. IHI NC Fed
 - 4/27/98 facsimile correspondence BEW to Sond cc JB, SVE, CS and LS (A/CP)
 - 5/28/98 correspondence from GMM to Douglas S. Lang, Esq. cc JB and BEW (A/CP)
- Correspondence Meckenstock, et al. v. IHI NC Fed
 - 8/3/99 correspondence BEW to SVE (A/CP)
 - 8/3/99 correspondence BEW to CS (A/CP)
 - 6/18/99 BEW to SVE (A/CP)
 - 6/18/99 BEW to CS (A/CP)
 - 6/7/99 BEW to SVE (A/CP)
 - 5/28/99 BEW to SVE (A/CP)
 - 5/28/99 BEW to CS (A/CP)
 - 5/24/99 BEW to CS (A/CP)
 - 5/24/99 BEW to SVE (A/CP)
 - 2/5/99 BEW to CS (A/CP)
 - 2/5/99 BEW to SVE (A/CP)
 - 2/5/99 BEW to LS (A/CP)
 - 1/27/99 BEW to SVE, LS and CS (A/CP)
 - 1/11/99 BEW to SVE, LS and CS (A/CP)
 - 12/18/98 BEW to SVE, LS and CS (A/CP)
 - 5/15/98 GMM to Betina M. Lawton (A/CP)
 - 10/22/98 BEW to Lawton (A/CP)
 - 10/15/98 BEW to Lawton with enclosure (A/CP)
 - 6/19/98 BEW to Lawton (A/CP)
 - 6/19/98 eight-page fax BEW to Botticelli (A/CP)
 - 6/19/98 eight-page fax BEW to Halpern (A/CP)
 - 6/19/98 correspondence BEW to GMM with enclosure (A/CP)
 - 6/19/98 eight-page fax BEW to Botticelli (A/CP)
 - 6/19/98 two-page fax Halpern to BEW (A/CP)
 - 6/19/98 eight-page fax BEW to Halpern (A/CP)
 - 6/19/98 correspondence BEW to Halpern with enclosure (A/CP)
 - 6/19/98 four-page fax Halpern to BEW (A/CP)
 - 6/18/98 three-page fax Halpern to BEW (A/CP)
 - 6/18/98 nine-page fax Halpern to BEW (A/CP)
 - 6/16/98 eight-page fax Henry to BEW (A/CP)
 - 6/18/98 correspondence MV to BEW (A/CP)
 - 6/15/98 16-page fax Halpern to BEW (A/CP)
 - 6/12/98 four-page fax Halpern to BEW (A/CP)
 - 6/12/98 four-page fax Halpern to BEW (A/CP)
 - 6/12/98 facsimile Halpern to BEW (A/CP)
 - 6/12/98 two-page fax Halpern to BEW with handwritten notes BEW (A/CP)
 - 6/11/98 46-page fax Lawton to BEW (A/CP)

• 6/10/98 10-page fax BEW to Lawton (A/CP)

Rusty Tucker

- 7/10/98 Halpern to MV with enclosure cc Lang (A/CP)
- 7/10/98 Halpern to MV with enclosure cc Lang (A/CP)
- 7/10/98 Halpern to MV with enclosure cc Lang (A/CP)
- Undate five copies of Mississippi Supreme Court action regarding the disbarment of James Russell Tucker (WP)
- 7/10/98 Halpern to MV with enclosure cc Lang (A/CP)
- Undated miscellaneous handwritten notes (WP)

· Miscellaneous Documents

7/29/98 facsimile correspondence BEW to RB (A/CP)

Keith Yarborough

- Undated memorandum Julie Bell to BEW (A/CP)
- 3/18/97 eight-page facsimile transmission JB to BEW (A/CP)
- Undated anonymous letter to SVE with handwritten notes on it (WP)
- Miscellaneous handwritten notes BEW (WP)

Yarborough

- Undated handwritten notes AEF (WP)
- Background check Yarborough (WP)
- Undated AEF compilation of information regarding Keith Yarborough (WP)
- 7/30/98 property summary of Gerald Mansur (WP)
- 7/29/98 facsimile transmission GMM to AEF and BEW (A/CP)
- Undated AEF list of scheduled depositions (WP)
- 7/31/98 correspondence GMM to BEW marked Confidential Attorney Work Product with enclosures cc CR and RB (A/CP)
- 7/30/98 four-page fax AEF to Grodi of Documents Resources/Texas (note only the fax cover page available here) (WP)
- 7/29/98 four-page fax AEF to Henry (A/CP)
- 7/30/98 three-page fax Henry to AEF (A/CP)
- 7/29/98 facsimile BEW to SVE and JB cc GMM and AEF (A/CP)
- 8/3/98 fax cover page for three-page fax AEF to Allison Blackman (A/CP)

Dr. King Affidavit

- 6/11/98 handwritten note to BEW from Andrea of IHI with printed internote postings attached (A/CP)
- 6/16/98 23-page fax MV to BEW (A/CP)
- 10/2/98 BEW to Lawton with enclosures (A/CP)
- 8/24/98 BEW to MV cc JB and GMM with enclosures (A/CP)
- 8/14/98 two-pages of a 42-page fax BEW to Lawton and Botticelli (A/CP)

- 7/28/98 BEW to Lawton with enclosures (A/CP)
- 7/27/98 facsimile BEW to Lawton cc GMM and JB (A/CP)
- 7/27/98 11-page fax BEW to Lawton (A/CP)
- 6/10/98 GMM to Lawton with enclosures cc BEW and AS (A/CP)
- 7/11/98 Memo Lawton to Sond, Botticelli, MV and Dennis Lawson cc BEW (A/CP)
- 7/6/98 BEW to Lawton with enclosures (A/CP)
- 7/1/98 three-page fax BEW to Lawton (A/CP)
- Undated Priority Mail package from IHI to Wood & Francis bearing handwritten notes of BEW containing numerous web printouts regarding Meckenstock litigation (WP)

- Nemelka, David (Loan to Van Etten/IHI) IHI General
 - 5/26/99 nine-page fax Peditto/BEW to Anna Taylor, Mayflower Capital (A/CP)
 - 4/1/99 facsimile BEW to David Namelka (A/CP)
- Market America Research IHI General
 - Undated eight-page MLM Insider Magazine article (WP)
 - Undated 38-page law library article by Spencer M. Reese (WP)
 - Undated web article regarding MLMs (WP)
 - 7/28/99 Forbes article (WP)
 - 6/22/99 16-page news article from Montana State Auditor's Office (WP)
- Attorney Notes
 - Undated draft Response to Plaintiff's Motion to Compel Market America v. Ray Rossi (WP)
 - Draft IHI Response and Memorandum in Opposition to Plaintiff's Motion to Compel-Market American vs. Ray Rossi (WP)
- Research
 - 1/6/97 U.S. Code Research (WP)
- Market America v. Rossi
 - Miscellaneous handwritten note from BEW to AEF (WP)
 - 4/20/98 handwritten note Elaine Tarkington to CTF (WP)
 - 3/16/98 CR to BEW (A/CP)
- Internet Thread on Pumping and Dumping Stock in Meckenstock
 - 6/3/99 print-out of downloaded material from the internet regarding pumping and dumping stocks (WP)

- Meckenstock v. IHI (Internet Postings By and To D. Meckenstock) Research Internet IHI
 #1
 - 6/3/99 BEW copy of email transmission from AEF to BEW (WP)(A/CP)
 - 5/28/99 BEW copy of email transmission from AEF to BEW (WP)(A/CP)
 - 5/19/99 several hundred pages of printed internet postings regarding IHI from Silicon Investors website (WP)
- Meckenstock v. IHI (Internet Postings By and To D. Meckenstock) Research Internet -BAAT #2
 - 6/3/99 BEW copy of email transmission from AEF to BEW (WP)(A/CP)
 - 5/28/99 BEW copy of internet transmission from AEF to BEW (WP)(A/CP)
 - 5/25/99 approximately 100-200 pages of posted internet transmissions regarding BAAT Electric Vehicles to Silicon investors (WP)
 - 5/26/99 several hundred pages of email transmissions regarding BAAT Electronic Vehicles to Silicon investors' website (WP)
- Meckenstock v. IHI (Internet Postings By and To D. Meckenstock) Research Internet -BAAT #1
 - 6/3/99 BEW copy of email transmission from AEF to BEW (WP)(A/CP)
 - 5/28/99 BEW copy of email transmission from AEF to BEW (WP)(A/CP)
 - 5/20/99 approximately several hundred pages of printed email transmissions regarding BAAT Electric Vehicles Posted to Silicon Investors' website (WP)
 - 5/21/99 several hundred pages of email transmissions regarding BAAT Electric Cars to Silicon Investors' website (WP)

- IHI General Correspondence 1
 - 10/21/96 BEW to SVE (A/CP)
 - 10/16/96 BEW to SVE (A/CP)
 - 7/15/96 four-page fax BEW to SVE marked Personal and Confidential (A/CP)
 - 6/18/96 three-page fax BEW to SVE only 2 pages of this fax available (A/CP)
 - 5/15/96 correspondence BEW to SVE with enclosures (A/CP)
 - 5/14/96 BEW to SVE with enclosures (A/CP)
 - 4/24/96 BEW to SVE with enclosures (A/CP)
 - 4/15/96 four-page fax SVE to BEW (A/CP)
 - 4/18/96 facsimile BEW to SVE (A/CP)
 - 4/17/96 BEW to SVE with enclosures (A/CP)
 - 4/12/96 BEW to SVE with enclosure (A/CP)
 - 4/15/96 two-page fax Hywel Leonard, Esq. to BEW cc SVE re Jerry L. Brooks v. SVE, Wake County 95 CVS 978 and 979 (A/CP)
 - 3/27/96 BEW to SVE with enclosures (A/CP)
 - 3/12/96 SVE to BEW with enclosure (A/CP)
 - 2/19/96 BEW to SVE with enclosure (A/CP)

- 2/8/96 BEW to SVE with enclosures (A/CP)
- 11/9/95 16-page fax GMM to BEW with handwritten notes BEW (A/CP)
- 1/4/96 BEW to SVE (A/CP)
- 1/8/96 BEW to SVE with enclosure (A/CP)
- 12/18/95 BEW to SVE (A/CP)
- 11/16/95 BEW to SVE (A/CP)
- 11/13/95 BEW to SVE with enclosures (A/CP)
- 10/30/95 BEW to SVE with enclosures (A/CP)
- 10/26/95 GMM to CS, LS, SVE and BEW (A/CP)
- 10/26/95 IHI Board of Directors Meeting Agenda (A/CP)
- 7/11/95 five-page fax BEW to SVE (A/CP)
- 7/27/95 draft letter from SVE to Board of Directors (WP)
- 6/26/95 eight-page fax BEW to SVE (A/CP)
- IHI General Correspondence 2
 - 11/13/97 10-page fax from Victor Palmer, IHI to Wood & Francis (A/CP)
 - 5/30/97 copy of certified letter to Sherry Lee with yellow Post-It of notes from Elaine Tarkington attached (A/CP)
 - 12/12/97 BEW to CR with enclosure (A/CP)
 - 12/4/97 three-page fax BEW to CR and GMM (A/CP)
 - Miscellaneous handwritten notes BEW (WP)
 - 12/18/97 handwritten notes BEW (WP)
 - 12/10/97 two-page fax CR to BEW (A/CP)
 - 12/8/97 CR to JAB (A/CP)
 - 12/4/97 fax BEW to CR with enclosure (A/CP)
 - 11/11/97 memo from AW to BEW with handwritten note BEW (A/CP)
 - 11/4/97 JAB to John S. Smith, Bureau of Consumer Protection, Georgia cc SVE, CR and FDB (A/CP)
 - 11/24/97 three-page fax CR to JAB (A/CP)
 - 8/4/97 BEW to JB cc SVE, CTF, GMM, CR and Keith Mackey (A/CP)
 - 12/10/96 six-page fax AW to Elaine Tarkington (A/CP)
 - 9/25/97 invoice James S. Holiday to IHI c/o GMM (A/CP)
 - 11/19/97 CR to BEW with enclosure (A/CP)
 - 11/19/97 GMM to James S. Holiday cc BEW, JB, Jeff Trendel and CR (A/CP)
 - 11/13/97 four-page fax CR to BEW (A/CP)
 - 11/13/97 FDB to JAB (A/CP)
 - 11/10/97 BEW to SVE cc JB and CR (A/CP)
 - 11/10/97 fax BEW to FDB cc SVE, JB and CR (A/CP)
 - 11/7/97 handwritten note AW to BEW (WP)
 - 9/15/97 copy of handwritten note on IHI letterhead to SVE and Staff (A/CP)
 - 11/7/97 two-page fax BEW to CR (A/CP)
 - 11/5/97 five-page fax BEW to GMM with handwritten notes (A/CP)
 - 11/4/97 seven-page fax GMM to BEW (A/CP)
 - 11/4/97 BEW to GMM with enclosure (A/CP)
 - 10/31/97 22-page fax BEW to GMM (A/CP)
 - 10/28/97 12-page fax CR to JAB (A/CP)
 - 10/16/97 BEW to GMM with enclosure (A/CP)

- 10/9/97 eight-page fax CR to BEW (A/CP)
- 9/25/97 two-page fax Tim Otto, IHI to BEW (A/CP)
- 9/30/97 26-page fax CR to JAB cc SVE, JB, Derek Striker, Jeff Hooks, Peter Scanlon, BEW and FDB (A/CP)
- 9/22/97 eight-page fax CR to JAB (A/CP)
- 6/7/96 SVE to Frank R. Liggett, III (A/CP)
- IHI General Correspondence 3
 - 1/14/98 eight-page fax CR to BEW (A/CP)
 - 6/12/98 six-page fax AS to BEW (A/CP)
 - 6/15/98 IHI Board of Directors Meeting Agenda with some handwritten notes BEW
 (A/CP)
 - 6/15/98 IHI Board of Directors Meeting Agenda (A/CP)
 - 4/6/98 three-page fax CR to BEW (A/CP)
 - 6/9/98 GMM to BEW cc Rob Hukezalie with enclosures (A/CP)
 - 5/6/98 BEW to Rob E. Zaytoun, Esq. cc SVE and JB (A/CP)
 - 4/3/98 seven-page fax GMM to BEW cc JB and DH (A/CP)
 - 4/3/98 GMM to BEW cc JB and DH with enclosure (A/CP)
 - 4/28/98 13-page fax from IHI consisting of revised IRSR application and Fast Start Program brochure (A/CP)
 - 4/17/98 one-page fax from Mayflower Capital re International Heritage, Inc. Draft Balance Sheet 31 March 1998 unaudited stamped Draft and Confidential (WP)
 - 8/18/97 copy of correspondence from Kari Howe to SVE with yellow Post-It note to BEW attached (A/CP)
 - 4/14/98 handwritten notes BEW (WP)
 - 4/13/98 handwritten notes BEW (WP)
 - 3/10/98 IHI memo Diane Wilson to SVE re transcription of message from FDB to SVE (A/CP)
 - 3/9/98 two-page fax R. Gene Davis to AS (A/CP)
 - 2/28/98 three-page BEW to Mark Bibbs (A/CP)
 - 2/27/98 GMM to BEW cc CR, SVE and JB (A/CP)
 - 2/25/97 CR to BEW (A/CP)
 - 2/24/98 BEW to GMM cc SVE and JB (A/CP)
 - 2/23/98 two-page fax BEW to CR (A/CP)
 - 2/18/98 four-page fax AW to BEW (A/CP)
 - Miscellaneous handwritten notes BEW (WP)
 - 2/17/98 IHI Memo GMM to all Vice Presidents review from the Office of General Counsel (A/CP)
 - 3/11/98 handwritten notes BEW (WP)
 - 2/17/98 three-page fax AW to BEW (A/CP)
 - 2/10/98 handwritten notes BEW (WP)
 - 1/30/98 three-page fax BEW to Marks Lane (A/CP)
 - 1/29/98 IHI Memo CR to Dawn McIntyre (A/CP)
 - 1/29/98 seven-page fax GMM to BEW (A/CP)
 - 1/28/98 two-page fax Marks Lane to BEW (A/CP)
 - 1/21/98 five-page fax BEW to JB (A/CP)
 - 1/21/98 five-page fax BEW to SVE (A/CP)

- 1/21/98 draft correspondence BEW to GMM (WP)
- 1/21/98 five-page fax BEW to CR (A/CP)
- 1/21/98 five-page fax BEW to Peter Scanlon (A/CP)
- 1/21/98 Memorandum BEW to SVE, JB, CR, and Peter Scanlon cc CTF re DSA Multi-Level Marketing Seminar on 1/15/98 (A/CP)
- 1/19/98 three-page fax BEW to JB (A/CP)
- 1/19/98 three-page fax BEW to SVE (A/CP)
- 1/19/98 three-page fax BEW to CR (A/CP)
- 1/16/98 faxed Martin Luther King, Jr. flyer from IHI (A/CP)
- 1/29/98 handwritten notes BEW (WP)
- 1/21/98 facsimile BEW to SVE cc JB, CR and CTF (A/CP)
- 1/16/98 News & Observer Editorial Under The Dome 5/21/97 (WP)
- 1/25/98 facsimile of letter from SVE to IHI Employees with handwritten notes (A/CP)
- 1/14/98 four-page fax BEW to Shannon Zeko (A/CP)
- 1/13/98 four-page fax BEW to CR (A/CP)
- 1/13/98 four-page fax BEW to FDB (A/CP)
- 1/14/98 faxed communication BEW to Shannon Zeko cc Peter Scanlon and CR (A/CP)
- 1/9/98 two-page fax Shannon Zeko to BEW (A/CP)
- 1/13/98 three-page fax CR to BEW (A/CP)
- 1/12/98 two-page fax CR to FDB (A/CP)
- 1/7/98 three-page fax CR to BEW (A/CP)
- IHI General Correspondence 4
 - 6/1/98 six-page fax from Marks Lane to BEW (A/CP)
 - 5/28/98 two-page fax BEW to AW (A/CP)
 - 6/26/98 two-page fax CR to BEW (A/CP)
 - 7/2/98 correspondence BEW to SVE with attachment (A/CP)
 - 5/5/98 facsimile BEW to GMM cc JB (A/CP)
 - 5/5/98 facsimile BEW to GMM cc JB with attachment (A/CP)
 - 5/5/98 three-page fax BEW to GMM (A/CP)
 - 6/8/98 two-page fax CR to BEW (A/CP)
 - Undated research Alabama Code § 8-19-5 (WP)
 - 5/15/98 12-page fax IHI to BEW (A/CP)
 - 5/26/98 handwritten notes BEW (WP)
 - 5/28/98 handwritten notes BEW (WP)
 - 6/2/98 handwritten notes BEW (WP)
 - 6/12/98 handwritten notes BEW (WP)
 - 6/18/98 handwritten notes BEW (WP)
 - 1/16/98 two-page fax CR to FDB (WP)
- IHI General Correspondence 5
 - 10/30/98 copy of correspondence from Streich Lang to SVE with handwritten note from CR to BEW (A/CP)
 - 12/23/98 five-page fax from Alan Woodlief to BEW (A/CP)
 - 10/15/98 IHI Memo GMM to Board of Directors and Executive Management (A/CP)
 - 9/23/98 three-page fax GMM to BEW (A/CP)

- 9/16/98 four-page fax GMM to BEW (A/CP)
- 7/12/98 four-page fax GMM to BEW and RB (A/CP)
- 7/12/98 four-page fax GMM to BEW (A/CP)
- 7/17/98 five-page fax Linda Halstead to BEW (A/CP)
- 7/20/98 IHI Board of Directors Meeting Agenda with handwritten notes BEW (A/CP)
- 7/17/98 four-page fax GMM to BEW (A/CP)
- 7/17/98 three-page fax Linda Halstead to BEW (A/CP)
- 8/22/98 two-page fax Wendy Rainer, IHI to BEW (A/CP)
- 8/21/98 correspondence CR to FDB (A/CP)
- 9/1/98 correspondence CR to FDB (A/CP)
- 9/8/98 two-page fax Angie Stewart to BEW (A/CP)
- 7/2/98 two-page fax BEW to JB (A/CP)
- 8/4/98 four-page fax GMM to BEW (A/CP)
- 7/13/98 10-page fax Elaine Tarkington to Sue Halpner with handwritten notes of BEW attached (A/CP)
- 12/17/97 correspondence CR to BEW (A/CP)
- 9/2/97 IHI Memo SVE to BEW with handwritten note BEW attached (A/CP)
- 9/5/97 draft letter from G. L. Smith to Christine Lanning with handwritten note to BEW
- Miscellaneous handwritten notes
- 6/19/98 three-page fax BEW to SVE, JB, Rob Hukezalie (A/CP)

New Vision

- undated miscellaneous handwritten notes of BEW (WP)
- 10/19/98 three page facsimile from Paul Greenberg to BEW and Peter Reilly (A/CP)
- 10/21/98 three pages of an eleven page facsimile from Paul Greenberg to Peter Reilly and Ed Wainscott marked confidential and protected under the client-attorney privilege and work-product doctrine (A/CP)
- 10/22/98 one page facsimile of 10/21/98 memo from Paul Greenberg to Peter Reilly and Ed Wainscott sent by Greenberg to BEW with note from Greenberg to BEW written on it (A/CP)
- 10/20/98 one page facsimile from Paul Greenberg to BEW re: Peter Reilly (A/CP)
- 10/22/98 two page facsimile from Paul Greenberg to Peter Reilly re: suggested reply to Van Etten marked confidential and protected under the client-attorney privilege and work-product doctrine (A/CP)
- 10/22/98 four page facsimile from Ken Rudd to BEW marked confidential (A/CP)
- 10/22/98 three page facsimile from Peter Reilly of New Vision with 10/22/98 handwritten note from BEW on it (A/CP)

- Correspondence 5
 - 8/21/97 six-page fax BEW to CR (A/CP)
 - 8/20/97 correspondence BEW to SVE, JB and CR (A/CP)
 - 8/29/97 correspondence CR to BEW cc JB with enclosure (A/CP)
 - 8/14/97 BEW to JB with enclosure cc CR (A/CP)
 - 8/7/97 FDB to SVE (A/CP)

- 8/6/97 CR to BEW cc JB (A/CP)
- 8/5/97 Bernard A. Harrell to SVE (A/CP)
- 7/31/97 facsimile BEW to CR cc SVE and JB (A/CP)
- 7/30/97 two-page fax BEW to CR (A/CP)
- 7/15/97 13-page fax BEW to CR (A/CP)
- 7/8/97 five-page fax Pete Scanlon to BEW (A/CP)
- 7/7/97 six-page fax CR to BEW (A/CP)
- 7/3/97 11-page fax SVE to BEW and CR (A/CP)
- 7/2/97 seven-page fax BEW to CR (A/CP)
- 7/2/97 nine-page fax BEW to SVE (A/CP)
- 7/2/97 fax BEW to CR cc SVE (A/CP)
- 6/30/97 correspondence Christine Lanning of the North Carolina Department of Justice to BEW with handwritten notations (A/CP)
- 6/24/97 BEW to SVE cc CR and JB with enclosures bearing handwritten notations (A/CP)
- 6/24/97 correspondence CR to BEW with enclosures (A/CP)
- 6/13-15/97 transcript of telephone message from JAB to CTF (A/CP)
- 6/19/97 two-page fax Robert E. Zaytoun to BEW with handwritten notations of BEW
 (A/CP)
- 6/19/97 four-page fax BEW to SVE (A/CP)
- 6/18/97 facsimile correspondence BEW to SVE (A/CP)
- 6/12/97 nine-page fax BEW to Robert E. Zaytoun (A/CP)
- 6/12/97 10-page fax BEW to SVE (A/CP)
- 6/12/97 correspondence BEW to Robert E. Zaytoun cc SVE, CTF and CR with enclosures (A/CP)
- 6/12/97 facsimile BEW to SVE cc CR and CTF (A/CP)
- 6/12/97 fax BEW to Robert E. Zaytoun cc SVE, CTF and CR with enclosures (A/CP)
- 6/11/97 facsimile BEW to SVE (A/CP)
- 6/11/97 correspondence BEW to SVE cc CR, RSH, CS, LS, JAB, FDB with enclosures cc CTF, GMM without enclosures (A/CP)
- 6/11/97 facsimile BEW to SVE cc CR (A/CP)

Correspondence 6

- 1/15/98 13-page fax BEW to CR incomplete copy (A/CP)
- 10/28/97 correspondence CR to BEW cc JB with enclosures (A/CP)
- 10/27/97 six-page fax CR to BEW (A/CP)
- 10/16/97 correspondence CR to BEW cc JB and FDB (A/CP)
- 10/16/97 three-page fax BEW to CR (A/CP)
- 10/15/97 CR to BEW cc JB and FDB with enclosures (A/CP)
- 10/14/97 three-page fax CR to BEW (A/CP)
- 10/9/97 seven-page fax BEW to CR (A/CP)
- 10/6/97 copy of correspondence CR to Peter Lawson with handwritten notes BEW
 (A/CP)
- 9/5/97 two-page fax CR to BEW (A/CP)
- 9/4/97 fax BEW to CR cc SVE and JB (A/CP)
- 9/4/97 four-page fax BEW to CR (A/CP)
- 9/2/97 three-page fax BEW to CR (A/CP)

- 9/3/97 six-page fax CR to BEW (A/CP)
- 8/27/97 two-page fax BEW to CR (A/CP)
- 8/27/97 facsimile BEW to CR cc SVE and Jeff Hooks with enclosure (A/CP)
- 8/22/97 four-page fax CR to BEW (A/CP)

• Correspondence 7

- 6/2/98 BEW to CR cc SVE and JB (A/CP)
- 4/29/98 three-page BEW to CR (A/CP)
- 4/8/98 correspondence CR to BEW (A/CP)
- 3/3/98 11-page fax BEW to Robert E. Zaytoun (A/CP)
- 3/3/98 eight-page fax BEW to Robert E. Zaytoun partial copy (A/CP)
- 3/3/98 facsimile BEW to Robert E. Zaytoun (A/CP)
- 3/2/98 three-page fax BEW to Marks Lane (A/CP)
- 3/2/98 four-page fax Marks Lane to BEW (A/CP)
- 2/19/98 four-page fax CR to BEW (A/CP)
- 1/15/98 facsimile BEW to CR (A/CP)
- 1/6/98 Memo Alan Woodlief to BEW (A/CP)
- 12/19/97 BEW to CR (A/CP)
- 11/18/97 two-page fax CR to BEW (A/CP)
- 11/14/97 correspondence CR to BEW cc JB and FDB (A/CP)
- 11/7/97 four-page fax CR to Peter Lawson regarding Lloyd Ayers (A/CP)

North Carolina 6 Attorney General Correspondence

- 8/28/98 one-page fax SVE to BEW with notes from SVE to BEW (A/CP)
- Undated miscellaneous handwritten notes with handwritten notes BEW (WP)
- 3/6/98 nine-page fax JAB to BEW (A/CP)
- 8/19/98 four-page fax BEW to JB (A/CP)
- 8/19/98 four-page fax BEW to CR (A/CP)
- 8/19/98 four-page fax BEW to SVE (A/CP)
- 7/27/98 correspondence CR to BEW (A/CP)
- 7/13/98 seven-page fax BEW to CR (A/CP)
- 7/10/98 six-page fax BEW to CR (A/CP)
- 7/10/98 three-page fax BEW to CR (A/CP)
- 6/22/98 CR to BEW (A/CP)
- 6/8/98 BEW copy of correspondence CR to Christine Lanning cc SVE (A/CP)
- 4/16/98 17-page fax Alan Woodlief to BEW (A/CP)

CTF Material

- 5/21/97 nine-page fax SVE to CTF plus additional pages (A/CP)
- May 1997 draft agreement between CTF and Marlowe Builders, Inc. (WP)
- 5/21/97 21-page copy of the Insider (WP)
- 5/21/97 draft memo re IHI logo entitled Draft for Client Review Only with handwritten notations (WP)
- 5/21/97 two-page fax Garrick Francis to BEW, CTF and GMM re advertising issues (WP)

- Undated Miscellaneous N.C.G.S. § 14-291.10 (WP)
- 5/21/97 nine-page fax SVE to CTF (A/CP)
- 5/22/97 Volume 5, No. 98 of the Insider (WP)
- 5/22/97 six-page fax James Y. Kurr to BEW (A/CP)
- 5/30/97 four-page fax SVE to CTF (A/CP)
- Undated invitation to NC Legislative Black Caucus Foundation, Inc. function with handwritten notes (WP)
- CTF undated phone list NC Legislators with handwritten notes (WP)
- 5/14/97 three-page fax James Y. Kurr to CTF
- 5/16/97 three-page fax CTF to SVE
- 6/11/97 correspondence BEW to SVE cc CR, RSH, CS, LS, JAB and FDB with enclosures cc CTF and GMM without enclosures
- 7/18/97 four-page fax CR to CTF draft agreement between Michael F. Easley, Attorney General and IHI, SVE, LS and CS with strickouts (WP)
- 5/25/97 Amway document from the World Wide Web entitled "How Hard Is It To Get That Pen" with note from BEW to CTF attached (WP)

Attorney Notes

- 3/25/99 Rhonda Peditto copy of email transmission from Rhonda Peditto to BEW (A/CP)
- 3/5/98 BEW handwritten notes (WP)
- 5/21/97 transcript of message from JAB to BEW (WP)
- 7/21/98 transcript of message from Alan Hirsch to BEW (WP)
- 7/20/98 handwritten notes BEW (WP)
- 7/20/98 transcript of message from Alan Hirsch to BEW (WP)
- 5/7/98 handwritten notes BEW (WP)
- Miscellaneous handwritten notes BEW attached to 4/20/98 trial calendar (WP)
- Miscellaneous handwritten notes BEW (WP)
- 2/27/98 handwritten notes BEW (WP)
- 2/25/98 transcript of message from Alan Hirsch to BEW (WP)
- 2/24/98 handwritten notes BEW (WP)
- 9/18/97 SEC litigation release 15500 (WP)
- 1/6/98 seven-page fax Alan Woodlief to BEW (WP)
- Undated transcript of message from Christine Lanning to BEW (WP)
- Miscellaneous handwritten notes BEW (WP)
- 8/13/97 handwritten notes BEW (WP)
- 7/31/97 correspondence BEW to CR cc SVE and JB with enclosures (WP)
- 7/28/97 handwritten notes BEW (WP)
- 7/7/97 handwritten notes BEW (WP)
- 6/25/97 handwritten notes BEW (WP)
- 6/17/97 handwritten notes BEW (WP)
- 6/17/97 handwritten notes BEW (WP)
- 6/16/97 handwritten notes BEW (WP)
- 6/16/97 memo BEW to File (WP)
- 6/2/97 16-page fax Christine Lanning to BEW with handwritten notes and edits from BEW (WP)
- Undated memo from Julie Bell to CTF, BEW, GMM, Margie Hall and Elaine Tarkington (WP)

- 5/20/97 seven-page fax Garrick Francis and Roger Friedenson to SVE and JB with handwritten notes and edits BEW (WP)
- Draft agreement between Michael Easley and IHI with some notations plus three additional copies (WP)
- Undated transcript of message from JAB to BEW (WP)
- Undated memo from Julie Bell to CTF, BEW, GMM, Margie Hall and Elaine Tarkington (WP)
- Undated memo from Julie Bell to CTF, BEW, GMM, Margie Hall and Elaine Tarkington (WP)
- 5/8/97 handwritten notes BEW with attachment (WP)
- 5/5/97 internet download of AG Web Site (WP)
- 5/25/97 handwritten notes BEW (WP)
- Undated draft agreement between Mike Easley and IHI with numerous GMM edits (WP)
- 5/21/97 handwritten notes BEW (WP)
- 5/19/97 handwritten notes BEW (WP)
- Draft AG agreement with handwritten notes (WP)
- Undated three draft copies of Complaint and Motion to Preliminary Injunction each with some handwritten notes or edits (WP)
- 5/16/97 handwritten notes BEW (WP)
- 5/9/97 handwritten notes BEW (WP)
- 5/5/97 handwritten notes BEW(WP)
- 5/1/97 handwritten notes BEW (WP)
- North Carolina Attorney General Documents from Ralph McKinney
 - 8/25/98 handwritten note from Angie Stewart to BEW with large menagerie of documents, newspaper clippings, handwritten notes, letters, etc. from Ralph McKinney attached (A/CP)
- Attorney Notes
 - undated 3 draft copies of Complaint and motion for preliminary injunction each with some handwritten notes or edits (WP)
 - 5-16-97; 5-9-97; 5-5-97; 5-1-97; handwritten notes BEW (WP)
- North Carolina Attorney General Documents from Ralph McKinney
 - 8-25-98 handwritten notes from Angie Stewart to BEW with large managerie of documents, newspaper clippings, handwritten notes, letters, etc. from Ralph McKinney attached (WP)

- Miscellaneous Documents
 - 10/9/98 draft Affidavit of Chris Reid (WP)
 - 10/9/98 IHI Memo CR to BEW (WP)(A/CP)

- Undated IHI Memo Toby Kandies to CR, Pete Scanlon and Pete Otto cc Sales and Training re Unique Opportunities Meeting with attachments (WP)(A/CP)
- 10/8/98 letter from Jeanette Aikens to CR (A/CP)
- 9/15/98 Memo from Wendy Rainer to AEF cc CR and Peter Scanlon re Doug Sims and David Tillman with attachements (A/CP)
- 10/9/98 16-page fax CR to BEW (A/CP)
- 10/9/98 seven-page fax CR to BEW (A/CP)
- 10/9/98 one-page fax CR to BEW (A/CP)

Please note the last three or four faxes from CR to BEW were partials of a 28-page fax CR attempted to send BEW

10/2/98 fax from Tom Stroker to Steve Brown (A/CP)

10/5/98 nine-page fax CR to AEF (A/CP)

9/15/98 copy of memo from Wendy Rainer to AEF cc CR and Peter Scanlon re Doug Sims and David Tillman (A/CP)

10/5/98 two-pages of nine-page fax from CR to AEF (A/CP)

- International Heritage, Inc. Re: Douglas L. Sims, et al.
 - 9/22/98 one page of fax from IHI entitled Fax on Demand (WP)
 - Undated draft letter to IHI representatives seeking refunds (WP)
 - Undated draft letter to IHI rep regarding work in progress on refunds (WP)
 - Undated draft of IHI General Release (WP)
 - 5/13/98 draft letter to Crawford Powell (WP)
 - Undated draft letter to representative attorney (WP)
 - Undated distributor inquiry re Jessie Parraine (WP)
 - 9/22/98 additional account inquiry re Jessie Parraine (A/CP)
 - 9/24/98 AEF copy of email transmission from Wendy Rainer to BEW cc AEF (A/CP)
 - 11/6/98 Memo from Rhonda Peditto to IHI re deposition cancellation (A/CP)
 - 10/28/98 correspondence from Rhonda Peditto to Beverly Har re deposition cancellations with handwritten note from BEW to AEF included and draft notice of deposition attached (A/CP)
 - 10/1/98 nine-page fax BEW to CR (A/CP)
- Douglas Sims (Tillman/Unique) Attorney Notes
 - 4/23/99 BEW transcript of voice mail communication from Steve Reid (WP)
 - 10/23/98 miscellaneous handwritten notes (WP)
 - 12/13/99 AEF handwritten notes (WP)
 - Undated AEF copy of email transmission from AEF to BEW (WP)(A/CP)
 - 10/16/98 handwritten notes BEW (WP)
 - 9/24/98 Elaine Tarkington copy of email transmission BEW to Elaine Tarkington (WP)
- Miscellaneous Documents
 - Undated Chris Reid print-out of contact information for Paul Greenberg (WP)
 - Undated Memo from Wendy Rainer to AEF cc CR and Peter Scanlon (A/CP)
 - Undated copies of North Carolina Tort Law and Hombook sections (WP)

Client Documents

- 9/11/98 draft letter from Peter Scanlon to Infinity Marketing regarding Doug and Paige Sims (WP)
- 9/11/98 Peter Scanlon to David and Lita Tillman (WP)

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- Miscellaneous Documents
 - Undated deposition summary of Eric S. Block (WP)
 - 4/1/98 Julie Bell copy of email transmission from Ginny Marshall to Julie Bell with draft documents attached and additional Ginny Marshall copy of email transmission from Ginny Marshall to Julie Bell and handwritten notes of Julie Bell attached (WP)
 - Undated BEW handwritten deposition notes re Eric Block (WP)
 - Undated outline for Block deposition with attachment of documents and records to be used for examination and cross-examination (WP)

Correspondence

- 8/10/98 correspondence BEW to GMM cc JB with enclosures (A/CP)
- 7/1/98 BEW to GMM with enclosures (A/CP)
- 5/18/98 BEW to SVE with enclosures (A/CP)
- 3/5/98 BEW to CR with enclosures (A/CP)
- 2/10/98 BEW to CR with enclosures (A/CP)
- 2/2/98 BEW to CR with enclosures (A/CP)
- 1/27/98 BEW to CR with enclosures (A/CP)
- 1/20/98 BEW to CR with enclosures (A/CP)
- 12/23/97 BEW to CR (A/CP)
- 11/4/97 BEW to CR with enclosures (A/CP)
- 11/4/97 thee-page fax Shannon Zeko to BEW (A/CP)
- 10/30/97 four-page fax BEW to CR (A/CP)
- 10/27/97 12-page fax CR to BEW (A/CP)

Attorney Notes

- Miscellaneous handwritten note (WP)
- 11/4/97 handwritten note BEW (WP)
- 10/28/97 Wood & Francis internal document (WP)

Miscellaneous Documents

- undated deposition summary of Eric S. Block (WP)
- 4-1-98 Julie Bell copy of email transmission from Ginny Marshall to Julie Bell with draft documents attached and additional Ginny Marshall copy of email transmission from Ginny Marshall to Ginny Bell and handwritten notes of Julie Bell attached (WP)
- undated BEW handwritten notes on deposition re: Eric Block (WP)